

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

M.S.G.L., by and through her parents
GREGORIO GUZMAN REYES and
MARICRUZ LOPEZ SANTOS, and
individually,

Plaintiffs,

v.

UNITED STATES OF AMERICA,

Defendant.

Case No. 2:22-cv-01554-KKE

ORDER GRANTING STIPULATED
MOTION FOR EXTENSION OF TRIAL
AND PRETRIAL DEADLINES

JOINT STIPULATION

The parties hereby jointly STIPULATE AND AGREE to extend the following deadlines, which were set in the Court's October 24, 2024, Order Amending Trial Date and Related Dates (Dkt. 34), and the Court's March 20, 2025 Order granting Stipulated Motion for Extension of Pretrial Deadlines, as set forth below.

| <u>Deadline</u> | <u>Current Deadline</u> | <u>Proposed New Deadline</u> |
|---|--------------------------------|---|
| BENCH TRIAL | September 15, 2025 | December 8, 2025 |
| Disclosure of rebuttal expert testimony | April 3, 2025 | April 18, 2025 |

| | | |
|--|-------------------|-------------------|
| Discovery completed by | May 2, 2025 | June 30, 2025 |
| Dispositive Motions and motions challenging expert witness testimony (see LCR 7(d)). Such motions must be noted for consideration no later than the fourth Friday thereafter (see LCR 7(d)). | May 19, 2025 | August 11, 2025 |
| Settlement conference, if mediation has been requested by the parties per LCR 39.1, held no later than | July 17, 2025 | October 6, 2025 |
| Agreed LCR 16.1 Pretrial Order due, including exhibit list with completed authenticity, admissibility, and objections fields | August 25, 2025 | October 13, 2025 |
| Trial briefs, joint brief on motions in limine, preliminary proposed findings of fact and conclusions of law, and deposition designations due | September 2, 2025 | November 17, 2025 |
| Pretrial Conference | TBD | TBD |

A court may modify a schedule for good cause. Fed. R. Civ. P. 16(b)(4). Continuing pretrial and trial dates is within the discretion of the trial judge. *King v. State of California*, 784 F.2d 910, 912 (9th Cir. 1986). Good cause exists to continue the trial and pretrial deadlines as set out above. The parties have been diligent in completing the discovery in this case, including setting deposition dates for expert witnesses. Plaintiff's expert was scheduled to be deposed on April 8, 2025. The parties learned on Monday, March 24, 2025, that the expert needs to deal with health concerns and will not be available for deposition until June 10 or June 12, 2025. Because the deposition will need to take place after the Court's current dispositive motions deadline, moving the remaining deadlines will allow the parties time to assess the need for and file dispositive motions or motions to exclude, if any. The parties now request to move the trial date and remaining pretrial deadlines to accommodate the deposition of this expert.

For the reason set forth above, the parties believe that there is good cause to request an extension of the above-listed dates and respectfully request that the Court grant their motion.

SO STIPULATED.

DATED this 26th day of March, 2025.

Respectfully submitted,

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Acting United States Attorney

GEORGIA TREJO LOCHER, P.S.

s/ Whitney Passmore

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Attorneys for United States of America

I certify that this memorandum contains 401 words, in compliance with the Local Civil Rules.

ORDER

It is hereby ORDERED that the parties' motion is GRANTED. The new trial and pretrial deadlines are as follows:

| <u>Deadline</u> | <u>New Deadline</u> |
|---|---------------------|
| 10-Day BENCH TRIAL | December 8, 2025 |
| Disclosure of rebuttal expert testimony | April 18, 2025 |
| Discovery completed by | June 30, 2025 |
| Dispositive Motions and motions challenging expert witness testimony (see LCR 7(d)). Such motions must be noted for consideration no later than 28 days after this date (see LCR 7(d)). | August 11, 2025 |
| Settlement conference, if mediation has been requested by the parties per LCR 39.1, held no later than | October 6, 2025 |
| Agreed LCR 16.1 Pretrial Order due, including exhibit list with completed authenticity, admissibility, and objections fields | October 13, 2025 |
| Trial briefs, joint brief on motions in limine, preliminary proposed findings of fact and conclusions of law, and deposition designations due | November 17, 2025 |
| Pretrial Conference | TBD |

DATED this 27th day of March, 2025.



Kimberly K. Evanson
United States District Judge